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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

AMELIA PONCE,)	Case No. 1:20-cv-01664-EPG
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	
)	
ANDREW SAUL,)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have an 7-day extension of time, from June 21, 2021 to June 28, 2021, for Plaintiff to serve on defendant with Plaintiff's Confidential Letter Brief. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this late request. Plaintiff's original due date was June 18, 2021. (ECF Nos. 12, 13) On June 18, 2021, the President signed into law Juneteenth Day of Observance, making the day a federal holiday. It was Counsel's understanding that the new deadline for this matter resulting from the newly

1 created federal holiday was June 21, 2021. However, Counsel failed to move the deadline to
2 June 21, 2021, and instead left the deadline for June 18, 2021. As Counsel's office closed early
3 in celebration of Juneteenth Day, Counsel failed to properly calendar the new deadline. This
4 oversight was within Counsel's control and sincerely apologizes to Defendant and to the Court
5 for any inconvenience. It is not Counsel's intention to cause any unnecessary delays.

6 Defendant does not oppose the requested extension.

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8 Respectfully submitted,

9 Dated: June 28, 2021 PENA & BROMBERG, ATTORNEYS AT LAW

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11 By: /s/ Jonathan Omar Pena
12 JONATHAN OMAR PENA
13 Attorneys for Plaintiff

14 Dated: June 29, 2021 PHILLIP A. TALBERT
15 Acting United States Attorney
16 DEBORAH LEE STACHEL
17 Regional Chief Counsel, Region IX
18 Social Security Administration

19 By: */s/ Marcelo N. Illarmo
20 Marcelo N. Illarmo
21 Special Assistant United States Attorney
22 Attorneys for Defendant
23 (*As authorized by email on June 29, 2021)
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IT IS SO ORDERED.

/s/ Eric P. Grogg
UNITED STATES MAGISTRATE JUDGE